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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

BENJAMIN GALECKI,  
a/k/a Zencense Ben,

Defendant.

Case No. 2:15-CR-285-APG-EJY  
2:20-CR-164-APG-EJY

**Unopposed Motion for Extension of Time  
to File Galecki's Response to the  
Government's Motion to Substitute and  
Forfeit Property (ECF No. 582, 2:15-CR-  
285) and (ECF No. 29, 2:20-CR-164)**

**(Fifteenth Request)**

The United States moves this Court to extend the June 5, 2023, deadline for Benjamin Galecki's Response to the Government's Motion to Substitute and Forfeit Property by 182 days, to and including December 4, 2023. This is the fifteenth request for an extension of time. LR IA 6-1 and 6-2.

The government and counsel for Galecki and co-defendant Charles Burton Ritchie have been negotiating the terms of a stipulation that would address the substitution and forfeiture for numerous outcomes of this case (Forfeiture Stipulation). The parties have agreed to specific terms and are also waiting for the IRS-CI to resolve some issues Charles Burton Ritchie requested.

The continued significant progress in negotiating the resolution of the motion to substitute and to forfeit, which, if successful, will negate the need for Galecki to file his Response. If the negotiations fail, Galecki will file his Response to the Government's

1 Motion to Substitute and Forfeit Property, ECF No. 582, 2:15-CR-285, and ECF No. 29,  
2 2:20-CR-164, and requests an extension of time to file his Response.

3 Counsel does not make this request for purposes of delay but acts diligently to  
4 resolve the Motion to Substitute and to Forfeit in an efficient manner without extended  
5 litigation and without unnecessarily taxing judicial resources.

6 Galecki and the government respectfully request a 182-day extension of Galecki's  
7 Response. Counsel for Galecki, Assistant Federal Public Defender and Appellate Chief  
8 Amy Cleary, and AUSA Daniel Hollingsworth advise they agreed to this 182-day extension  
9 to and including December 4, 2023.

10 Dated: May 19, 2023.

11 Respectfully submitted,

12 JASON M. FRIERSON  
13 United States Attorney

14 /s/ Daniel D. Hollingsworth  
15 DANIEL D. HOLLINGSWORTH  
16 Assistant United States Attorney

17 IT IS SO ORDERED:

18   
19 ANDREW P. GORDON  
20 UNITED STATES DISTRICT JUDGE

21 DATED: May 22, 2023  
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